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5 *Attorneys for Plaintiffs*
6 Anabel Austin, et al.

7
8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

10 ANABEL AUSTIN, an individual; ADAM
11 BAILEY, an individual; MONINA BAILEY,
12 an individual; LARISA BARLAN, an
13 individual; LAURO BARLAN, an individual;
14 PATRICIA BARRIENTOS, an individual;
15 ELIJAH BECERRA, an individual; IZAIAH
16 BECERRA, an individual; JOSIAH
17 BECERRA, an individual; KARLA
18 BECERRA, an individual; RICHARD
19 BECERRA, an individual; MARCUS
20 BEVERLY, an individual; MASAYO
21 BEVERLY, an individual; MATAEUS
22 BEVERLY, an individual; SEVEN
23 BEVERLY, an individual; GINA
24 CERRITENO, an individual; FELICIA
25 DEWEY, an individual; MARK DEWEY, an
26 individual; BRENTON EARLEY, an
27 individual; BRIANNA EARLEY, an
28 individual; CASSANDRA EARLEY, an
individual; ENRIQUE FLORES, an
individual; DAVID GAETA, an individual;
FRANCO GAETA-MONDRAGON, an
individual; MATHIAS GAETA-
MONDRAGON, an individual; CONNIE
GARCIA, an individual; DALE GARCIA, an
individual; MICHAEL GERONIMO, an
individual; NICHOLAS GOERTEMILLE, an
individual; DASIA GOLDEN, an individual;
MIRIAM GORETTY MONDRAGON, an
individual; ERIKA HARVEY, an individual;
MIGUEL LEPE, an individual; MEREDITH
MCGOWAN, an individual; SCOTT D.
MCGOWAN, an individual; YOLANDA MC
HENRY, an individual; RICARDA
NAVARRETE, an individual; ADA
NOBRIGA, an individual; CODY Perna, an

Case No.: 2:24-CV-06966

DEMAND FOR JURY TRIAL

1 individual; ROBY PERNIA, an individual;
2 AARON EDUARDO RAMIREZ, an
3 individual; JOSE RAMIREZ, an individual;
4 KEVIN RAMOS, an individual; GERALEINE
5 REYES, an individual; ARMANDO
6 RODRIGUEZ, an individual; DIEGO
7 RODRIGUEZ, an individual; OMAR
8 RODRIGUEZ, an individual; RODRIGO
9 RODRIGUEZ, an individual; TERESA
10 RODRIGUEZ, an individual; ALEXA
11 RUELAS, an individual; LEONARDO
12 RUELAS, an individual; MARILYN
13 SALOVICH, an individual; ASIS SANCHEZ,
14 an individual; LOVELLE SANCHEZ, an
15 individual; LARON SCARBROUGH, an
16 individual; BIJAN TAGHILOU, an individual;
17 CRISTINA TAGHILOU, an individual;
18 FRANK TAGHILOU, an individual;
19 KAYVAN TAGHILOU, an individual;
20 KEISHA TAYLOR, an individual; WALTER
21 TAYLOR, an individual; DOMINIC
22 TEOXON, an individual; ROGER TEOXON,
23 an individual; ADAM TYSON, an individual;
24 ANNA TYSON, an individual; HUDSON
25 TYSON, an individual; LISA TYSON, an
26 individual; NATHAN TYSON, an individual;
27 MICAIAH TYSON, an individual; ZOE
28 TYSON, an individual; ARACELI
VALENCIA, an individual; LIBRADA
VALENCIA, an individual; VAMDI
VERTUDES, an individual; ALEXANDER
VILLAFUERTE, an individual; DAVID
VOLPE, an individual; LINDA VOLPE, an
individual;

Plaintiffs,

vs.

21 CHIQUITA CANYON, LLC, a Delaware
22 Limited Liability Company; WASTE
23 CONNECTIONS OF CALIFORNIA, a
24 California Corporation; CHIQUITA
CANYON, INC., a Delaware Corporation;
WASTE CONNECTIONS US. INC., a
Delaware Corporation; and DOES 1-150,
inclusive,

Defendants.

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1 Pursuant to Federal Rule of Civil Procedure 38, Plaintiffs ANABEL AUSTIN, an
2 individual; ADAM BAILEY, an individual; MONINA BAILEY, an individual; LARISA
3 BARLAN, an individual; LAURO BARLAN, an individual; PATRICIA BARRIENTOS,
4 an individual; ELIJAH BECERRA, an individual; IZAIAH BECERRA, an individual;
5 JOSIAH BECERRA, an individual; KARLA BECERRA, an individual; RICHARD
6 BECERRA, an individual; MARCUS BEVERLY, an individual; MASAYO BEVERLY,
7 an individual; MATAEUS BEVERLY, an individual; SEVEN BEVERLY, an individual;
8 GINA CERRITENO, an individual; FELICIA DEWEY, an individual; MARK DEWEY,
9 an individual; BRENTON EARLEY, an individual; BRIANNA EARLEY, an individual;
10 CASSANDRA EARLEY, an individual; ENRIQUE FLORES, an individual; DAVID
11 GAETA, an individual; FRANCO GAETA-MONDAGON, an individual; MATHIAS
12 GAETA-MONDAGON, an individual; CONNIE GARCIA, an individual; DALE
13 GARCIA, an individual; MICHAEL GERONIMO, an individual; NICHOLAS
14 GOERTEMILLE, an individual; DASIA GOLDEN, an individual; MIRIAM GORETTY
15 MONDRAGON, an individual; ERIKA HARVEY, an individual; MIGUEL LEPE, an
16 individual; MEREDITH MCGOWAN, an individual; SCOTT D. MCGOWAN, an
17 individual; YOLANDA MC HENRY, an individual; RICARDA NAVARRETE, an
18 individual; ADA NOBRIGA, an individual; CODY PERNA, an individual; ROBY
19 PERNA, an individual; AARON EDUARDO RAMIREZ, an individual; JOSE RAMIREZ,
20 an individual; KEVIN RAMOS, an individual; GERALEINE REYES, an individual;
21 ARMANDO RODRIGUEZ, an individual; DIEGO RODRIGUEZ, an individual; OMAR
22 RODRIGUEZ, an individual; RODRIGO RODRIGUEZ, an individual; TERESA
23 RODRIGUEZ, an individual; ALEXA RUELAS, an individual; LEONARDO RUELAS,
24 an individual; MARILYN SALOVICH, an individual; ASIS SANCHEZ, an individual;
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1 LOVELLE SANCHEZ, an individual; LARON SCARBROUGH, an individual; BIJAN
2 TAGHILOU, an individual; CRISTINA TAGHILOU, an individual; FRANK
3 TAGHILOU, an individual; KAYVAN TAGHILOU, an individual; KEISHA TAYLOR,
4 an individual; WALTER TAYLOR, an individual; DOMINIC TEOXON, an individual;
5 ROGER TEOXON, an individual; ADAM TYSON, an individual; ANNA TYSON, an
6 individual; HUDSON TYSON, an individual; LISA TYSON, an individual; NATHAN
7 TYSON, an individual; MICAIAH TYSON, an individual; ZOE TYSON, an individual;
8 ARACELI VALENCIA, an individual; LIBRADA VALENCIA, an individual; VAMDI
9 VERTUDES, an individual; ALEXANDER VILLAFUERTE, an individual; DAVID
10 VOLPE, an individual; LINDA VOLPE, an individual (collectively "Plaintiffs") hereby
11 demand a trial by jury in the above-captioned action of all issues triable by jury.
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14 Dated: September 11, 2024

TIMOTHY D. MCGONIGLE, APC



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16 By: _____
17 TIMOTHY D. McGONIGLE
18 Attorney for Plaintiffs
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1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, State of California. I am over the age of 18
3 and not a party to the above-referenced action. My address is 1880 Century Park East,
4 Suite 516, Los Angeles, California 90067.

5 On September 11, 2024, I served the foregoing document described as:

6 **DEMAND FOR JURY TRIAL**

7 Electronically by using the Court's ECF/CM System.

8	Gary J. Smith (SBN 141393) gsmith@bdlaw.com	Attorneys for Chiquita Canyon, LLC, Waste Connections of California, Chiquita Canyon, Inc. and Waste Connections US, Inc.
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1 I am readily familiar with the firm's practice of collection and processing correspondence
2 for mailing. Under that practice it would be deposited with the U.S. Postal Service on that
3 same day with postage thereon fully prepaid in the ordinary course of business. I am
4 aware that on motion of the party served, service is presumed invalid if postal
cancellation date or postage meter date is more than one day after date of deposit for
mailing in affidavit.

5 I declare that I am employed in the office of a member of the bar of this court at whose
6 direction the service was made. Executed on September 11, 2024, at Los Angeles,
California.

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8
9 By: 
10 Tim McGonigle
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DEMAND FOR JURY TRIAL